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7 Attorneys for Defendants ROYAL & SUN
ALLIANCE INSURANCE PLC (incorrectly
8 named herein as RSA INSURANCE GROUP);
CERTAIN UNDERWRITES AT LLOYD'S
9 LONDON as follows: LIBERTY SYNDICATE
4472 (incorrectly named herein as LIBERTY
10 SPECIALTYMARKETS INSURANCE GROUP),
NAVIGATORS SYNDICATE 1221 (incorrectly
11 named herein as NAVIGATORS UNDERWRITING
AGENCY LIMITED), BRIT SYNDICATE 2987
12 (incorrectly named herein as BRIT GLOBAL
SPECIALTY), and TRAVELERS SYNDICATE
13 5000 (incorrectly named herein as TRAVELERS
MARINE CARGO)

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 KUNDE ENTERPRISES, INC.; VINTAGE
WINE ESTATES, INC.,

19 Plaintiff(s),
20

21 v.

22 NATIONAL SURETY CORPORATION;
CERTAIN UNDERWRITES AT LLOYD'S
23 LONDON; RSA INSURANCE GROUP;
LIBERTY SPECIALTY MARKETS
INSURANCE GROUP; NAVIGATORS
24 UNDERWRITING AGENCY LIMITED;
BRIT GLOBAL SPECIALTY; TRAVELERS
25 MARINE CARGO,

26 Defendant(s).
27

Case No. 3:19-cv-06636-SK

**JOINDER IN NOTICE OF REMOVAL OF
ACTION**

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1 Defendants ROYAL & SUN ALLIANCE INSURANCE PLC (incorrectly named herein as
2 RSA INSURANCE GROUP) and CERTAIN UNDERWRITERS AT LLOYD'S LONDON as
3 follows: LIBERTY SYNDICATE 4472 (incorrectly named herein as LIBERTY SPECIALTY
4 MARKETS INSURANCE GROUP), NAVIGATORS SYNDICATE 1221 (incorrectly named herein
5 as NAVIGATORS UNDERWRITING AGENCY LIMITED), BRIT SYNDICATE 2987 (incorrectly
6 named herein as BRIT GLOBAL SPECIALTY), and TRAVELERS SYNDICATE 5000 (incorrectly
7 named herein as TRAVELERS MARINE CARGO) hereby join in Defendant NATIONAL SURETY
8 CORPORATION'S Notice of Removal to this Court of the state court action described in the said
9 Notice of Removal. Defendant CERTAIN UNDERWRITERS AT LLOYD'S LONDON is not a
10 separate entity, but simply a manner of referring collectively to the Lloyd's syndicates listed herein.

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12 Respectfully submitted,

13 Dated: October 17, 2019

GIBSON ROBB & LINDH LLP

14
15 /s/ G. GEOFFREY ROBB

G. GEOFFREY ROBB

16 grobb@gibsonrobb.com

17 Attorney for Defendants ROYAL & SUN
18 ALLIANCE INSURANCE PLC and CERTAIN
19 UNDERWRITES AT LLOYD'S LONDON as
20 follows: LIBERTY SYNDICATE 4472;
21 NAVIGATORS SYNDICATE 1221,
22 BRIT SYNDICATE 2987; TRAVELERS
23 SYNDICATE 5000
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